

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : Chapter 13
Stephen L. Dickson : Case No. 1-13-02665-RNO
Debtor :
Charles J. Dehart III :
Chapter 13 Trustee :
v. :
Stephen L. Dickson :
Respondent :
:

OBJECTION TO CERTIFICATE OF DEFAULT

AND NOW, this 30th day of May, 2017, comes the Debtor, Stephen L. Dickson, by his attorneys, CGA Law Firm, Lawrence V. Young, Esquire, and does file the within Objection averring that:

1. The within case was filed under Chapter 13 on May 22, 2013.
2. A Stipulation was entered into and filed with the Court on August 28, 2014 to resolve Trustee Motion to Dismiss. A Certification of Default was filed on May 12, 2017 .
3. The Debtor will make a payment of \$1500.00 on June 3, 2017. The Debtor will an additional payment of \$1,546.63 on June 23, 2017.
4. The Debtor is attempting to sell his home, which would allow him to pay the Chapter 13 Plan in full.

WHEREFORE, the Debtor respectfully requests that this Honorable Court not grant the relief requested at this time until a hearing is scheduled on the Certification of Default, at which time the account will be current .

Respectfully submitted,

CGA Law Firm

/s/ Lawrence V. Young
Lawrence V. Young , Esquire
Counsel for Debtor
Sup. Ct. I.D. No. 21009
135 North George Street
York, PA 17401
(717) 848-7110

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Movant :
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on May 30, 2017, he served a true and correct copy of the attached Objection to Certificate of Default via ECF, upon the following:

Charles J. DeHart, III
ECF

Respectfully submitted,

CGA Law Firm

/s/ Lawrence V. Young
Lawrence V. Young
Counsel for Debtor
Sup. Ct. I.D. No. 21009
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